

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LUIS DANNY SOTO,

Plaintiff,

-against-

Endeavor Group Holdings, Inc., a/k/a William Morris Endeavor, a/k/a WME-IMG, a California company, **IMG** a/k/a International Management Group, a New York company, **TKO Group Holdings, Inc.** a/k/a TKO, a New York corporation, **TKO Operating Company, LLC**, a/k/a Zuffa, Inc., a Nevada company, **World Wrestling Entertainment**, a/k/a Capitol Wrestling Corporation, a/k/a CWC a/k/a WWE, a/k/a WW, a/k/a WWF, a/k/a World Wrestling Federation, a/k/a WWWF, a/k/a World Wide Wrestling Federation, a Connecticut company, **Ultimate Fighting Championship** a/k/a UFC, a Nevada company, **Dwayne Douglas Johnson**, an individual, **Dany Garcia Rienzi**, an individual, **Seven Bucks Productions**, a California company, **Ari Emanuel**, an individual, **Patrick Whitesell**, an individual, **Dana Frederick White Jr.**, an individual, **Vincent Kennedy McMahon**, an individual, **Shane McMahon**, an individual, **Stephanie McMahon**, an individual, **Paul Levesque**, an individual,

Defendants.

Case No. _____

COMPLAINT

JURY TRIAL DEMANDED

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Plaintiff LUIS DANNY SOTO (“Plaintiff”) brings this action for damages against Endeavor Group Holdings, Inc., a/k/a William Morris Endeavor, a/k/a WME-IMG, a California company, IMG a/k/a International Management Group, a New York company, TKO Group Holdings, Inc. a/k/a TKO, a New York corporation, TKO Operating Company, LLC, a/k/a Zuffa, Inc., a Nevada company, World Wrestling Entertainment, a/k/a Capitol Wrestling Corporation, a/k/a CWC a/k/a WWE, a/k/a WW, a/k/a WWF, a/k/a World Wrestling Federation, a/k/a WWWF, a/k/a World Wide Wrestling Federation, a Connecticut, Ultimate Fighting Championship a/k/a UFC, Dwayne Douglas Johnson, an individual, Dany Garcia Rienzi, an individual, Seven Bucks Productions, a California company et al., and alleges as follows:

1. Evidence will show that the WWE has a history of corrupting officials in Connecticut, New York, Florida and Georgia. Known for paying hush money to judges, prosecutors and senators. In fact, the only reason the WWE and the UFC merged was to circumvent the laws that hold their action liable in the Atlantic States. Their corrupt actions and history of racism have led to the discrimination pathways and its effects in causal health where their companies prey on law enforcement and civilians for drug therapy. From 2021 and through 2024 Plaintiff was assaulted, threatened, harassed, stalked, put in danger, and discriminated against by the legal departments, personnel departments, managers, executives, board members, shareholders and employees of Endeavor Group Holdings, Inc. (“Endeavor”), IMG, TKO Group Holdings (“TKO”), World Wrestling Entertainment (“WWE”), Ultimate Fighting Championship (“UFC”) and a company owned and operated by Dwayne Douglas Johnson and Dany Garcia Rienzi, Seven Bucks Productions. Without consent or knowledge, equipment was installed in my home that is used to treat mental disorders common among drug abusers. This equipment was used on me without my

consent. They allowed the equipment to be used by other companies, celebrities, athletes, politicians including Donald Trump and his family, and law enforcement. Endeavor, IMG, TKO, WWE, UFC and Seven Bucks Productions allowed the equipment to be used by its executives, managers, colleagues, employees and their families, friends, favorite universities, politicians, law enforcement officials et al. Collusion between these parties and others has occurred to defraud me of my rights and these parties have conspired to accomplish something forbidden by law causing moral injury to my being.

2. The equipment used to treat anxiety, panic attacks, depression, and sleep disorders associated with drug use was used repeatably and knowingly without my consent.

3. A black-market for sex, drugs, political campaign fund raising and political favors for officials and VIPs that put their colleagues, families, friends, officials from universities, officials from political action committees et al., on the system for financial profit, leniency against past and future crimes, sexual favors from celebrities and co-workers, to enhance their company's profile, advance their individual careers, and enhance their lives to my detriment.

Medical patient simulators, virtual medical patient simulators, crash test dummies, virtual crash test dummies, and other anthropomorphic test devices used in wrestling and mixed martial arts were connected to the equipment installed without my consent. These devices received multiple shots to the head, groin and spine repeatedly to cause Plaintiff physical and mental pain and eventually death.

4. A gas chromatography-mass spectrometry ("chromatography") was used with the women of these companies and the female family members of its executives, shareholders, employees and their lawyers leaving a rancid and putrid smell and taste that lingers and causing me stress, embarrassment, pain and confusion.

5. Endeavor, IMG, TKO, WWE, UFC and Seven Bucks Productions encouraged and directed law enforcement to harass and to marginalize me by getting local police officers and federal police officers to participate in a scheme where they requested personal information on me including medical records and shared it with others involved.

6. Employees of these companies went to my home and the home of family. They caused emotional distress and physical pain by passing intrusive video of themselves at work and other environments including in intimate situations through the equipment. Videos contained images of children being tortured, sexually abused and killed. Pedophilia videos were put through regularly when these firms were on. Other videos contained males engaged in gay sex. Lookalike impersonators of me were depicted engaging in acts of crime, rape and sex including homosexual sex meant to alarm Plaintiff and damage Plaintiff's reputation.

7. Video gaming systems were attached that caused pain and suffering by adding repetitive, violent, and intrusive materials meant to cause confusion, disorientation, and cognitive impairment.

8. These company executives and their celebrity employees bribed politicians, judges, prosecutors, and law enforcement officials in New York, New Jersey and Connecticut with money, company stocks, gifts, and services in a quid pro quo in return for forgiveness to this crime. Firms here contributed to a money account to bribe witnesses and others involved. Plaintiff was prejudiced based on personal attributes and political affiliation by these companies. There executives and employees caused me pain and suffering based on who had reserved time after them and their political party. My civil rights were violated based on my perceived race, religion, political association, political stance, gender and sexual orientation. Plaintiff was told

repeatedly that this happened because Plaintiff was not part of a protected group, i.e., black or Muslim or gay.

9. Plaintiff became ill when a program meant to treat Parkinson's disease that can cause seizures was used. These companies conspired to injure, oppress, threaten, and intimidate Plaintiff. Endeavor, IMG, TKO, WWE, UFC and Seven Bucks Productions attempted to hide their identity after using the system to circumvent responsibility.

10. Plaintiff was threatened with being framed using DNA and a "rape kit" and threatened with being infected with a sexually transmitted infection. Plaintiff was threatened by multiple wwe talent and the McMahon family of being infected with a virus.

11. Defendants used law enforcement to further violate Plaintiff's rights. The violation of these rights was purposefully done by Defendants to prevent criminal proceedings and civil action against Defendants and companies of Defendants and favored politicians.

12. Endeavor, IMG, TKO, WWE, UFC and Seven Bucks Productions executives and current and former employees were asked to participate in harassing and injuring Plaintiff: Ari Emanuel, Patrick Whitesell, Dana Frederick White Jr., Vincent Kennedy McMahon, Shane McMahon, Stephanie McMahon, Paul Levesque, Austin Watson, Jon Jones, Julianna Pena, Valentina Shevchenko, Daniel Cormier, Cain Velesquez, Quinton Jackson, Forest Griffin, Rashad Evans, Lyoto Machida, Anderson Silva, Luke Rockhold, Chris Weidman, Matt Hughes, Pat Miletich, Khabib Nurmagomedov, Chael Sonnen, Jerome Max Keli'i Holloway, Amanda Lourenco Nunes, Miesha Theresa Tate, Joanna Jendrzeczyk, Cris Cyborg, Raquel Pennington, Jessica Andrade, Carla Esparza, Holly Rene Holm, Ronda Rousey, Dwayne Johnson, Kofi Sarkodie-Mensah, Ettore Ewen, Leati Anoa'i, Colby Lopez, Rami Sebei, Kevin Yanick Steen, Randal Keith Orton, Luis Martinez, Fergal Devitt, Ronnie Killings, Shawn Michaels, Theodore Dibiase, William

Brenneman, James Hart, John Hodger Laurinaitis, Patrick Justin MacAfee, Terry Bollea, Ashley Fliehr, Richard Fliehr, David Richard Fliehr, Stephen Farrelly, Steve Austin, Cody Garrett Runnels Rhodes, Mark William Calaway, Oscar Gutierrez Rubio, Jessica Andrade, Amanda Nunes, Coby Covington, Jose Aldo, Georges St-Pierre, Michael Bisping, Jay Dee Penn III, Wanderlei Silva, Matt Serra, Sebastiaan Rutten, Tito Ortiz, Charles David Liddell, Randy Couture, Ken Shamrock, Royce Gracie, Charles Lewis, Deigo Sanchez, Daniel Jefferey Henderson, Stephan Bonnar, Rose Namajunas, Paul Donald Wight II, Mark Jerrold Henry and United States Secretary of Education Linda Marie McMahon, a former executive of World Wrestling Entertainment all took part.

13. The athletes mentioned above used the system on contrabands, and/or psychiatric medication continuously. Teams and members of training camps belonging to entire training facilities used and held down for others, passing from camp to camp spanning the UFC. WWE wrestlers used and passed to competing companies and their talent such as AEW (All Elite Wrestling) and Bellator MMA and NFL, NHL and MLB franchises. Plaintiff went through physical pain and mental anguish long after the sessions were over. Defendants depended on law enforcement and government officials to circumvent the law and overcome responsibility.

14. UFC President, Dana White, could be seen encouraging UFC champions to stay on the system for as long as possible, the champions stayed on for weeks. They passed on to family members and current and former competitors from the UFC. Its champions put through pornographic video, video games, and death video. They yelled and cursed and had sex on camera, sometimes appearing intoxicated and other times doing drugs on camera. The chromatography was used multiple times leaving Plaintiff dazed and confused. Endeavor, IMG, TKO, WWE, UFC and Seven Bucks Productions female talent and the wives of executives used the chromatography

multiple times tormenting Plaintiff while laughing and cursing on camera. It became so abhorrent that Plaintiff vomited numerous times daily and stopped eating due to loss of appetite.

15. Anthropomorphic devices used as medical simulators and virtual patient simulators known as crash test dummies with sensors that register pain and sensations were used on Plaintiff by passing the effects (pain) to Plaintiff after being struck by the wrestlers and fighters of the UFC and WWE. Plaintiff had episodic convulsions and bouts of agonizing pain. The sensing dummies were hit with sledgehammers, shot in the head with firearms, repeatedly stabbed with knives and hit with fists and kicks by professional mixed martial artists and men weighing over 200 pounds from the UFC and WWE. Heavyweight fighters, wrestlers and boxers that work for Endeavor, IMG, TKO, WWE, UFC and Seven Bucks Productions gave knockout punches to the dummies with sensors while connected to Plaintiff. Defendants knew their actions were unwanted by Plaintiff. Furthermore, Defendants knew such actions described here could lead to permanent injury and death.

16. Endeavor, IMG, TKO, WWE, UFC and Seven Bucks Productions used their time on the system to promote their product. Films, sporting events, and company appearances were promoted and done so to my detriment. Endeavor, IMG, TKO, WWE, UFC and Seven Bucks Productions also spent their time on with Plaintiff to attract new talent and talent from competing companies. This led to vitriol from companies losing talent which was translated to new hits to Plaintiff by companies losing contracts. Endeavor, IMG, TKO, WWE, UFC and Seven Bucks Productions gained new talent at record number from celebrities that needed criminal and civil action cover for their participation on the system with Plaintiff.

Endeavor, IMG, TKO, WWE, UFC and Seven Bucks Productions et al. paid local and federal law enforcement and city, state and federal politicians for protection. From New York to

California, from Florida to Texas police and officials were offered cash, drugs, sex, company shares, real-estate, new homes and apartments post office as hush money.

Prospect politicians from law firms, local and state law enforcement and federal law enforcement, including the FBI and Secret Service as well as military, and were given offers by Endeavor, IMG, TKO, WWE, UFC and Seven Bucks Productions et al. to clear the field in their perspective political office races and/or promises to be appointed to political positions in the future in big cities across the country, major states, and on the federal level.

PARTIES

17. Endeavor Group Holdings, Inc., a/k/a William Morris Endeavor, a/k/a WME-IMG, a California company.
18. IMG, a/k/a International Management Group, a New York company.
19. TKO Group Holdings, Inc., a/k/a TKO, a New York corporation.
20. TKO Operating Company, LLC, a/k/a Zuffa, Inc., a Nevada company.
21. World Wrestling Entertainment, a/k/a Capitol Wrestling Corporation, a/k/a CWC, a/k/a WWE, a/k/a WW, a/k/a WWF, a/k/a World Wrestling Federation, a/k/a WWWF, a/k/a World Wide Wrestling Federation, a Connecticut company.
22. Ultimate Fighting Championship, a/k/a UFC, a Nevada company.
23. Dwayne Douglas Johnson, an individual.
24. Dany Garcia Rienzi is, and at all relevant times herein was, an individual residing in California.

25. Seven Bucks Productions is, and at all relevant times herein was, a New York corporation with its principal place of business in California.
26. Ari Emanuel, an individual.
27. Patrick Whitesell, an individual.
28. Dana Frederick White Jr., an individual.
29. Vincent Kennedy McMahon, an individual.
30. Shane McMahon, an individual.
31. Stephanie McMahon, an individual.
32. Paul Levesque, an individual.

JURISDICTION AND VENUE

33. This court has original jurisdiction over the claims for relief asserted in this cross-complaint pursuant to 28 U.S.C. § 1332 because the matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs, and some Defendants are not citizens of the same state as the Plaintiff.
34. This court has personal jurisdiction over the Defendants under and consistent with the constitutional requirements of Due Process in that the Defendants, acting directly or through his agent or apparent agent, committed one or more of the following: a. The transaction of any business within the state; b. The making of any contract within the state; c. The commission of a tortious act within this district and d. The ownership, use, or possession of any real estate in this state.

35. Pursuant to § 301 of the New York civil practice law and rules because all Defendants systematically and continuously conduct and solicit business within the State of New York and from 2021 to 2025, Defendants have consistently and purposefully availed themselves of the privilege of conducting activities within New York State, thus invoking the benefits and protections of New York law. In return for these benefits and protections, Defendants must submit to the burdens of litigation in New York.

36. This court may exercise personal jurisdiction over Defendants pursuant to § 302 of the New York Civil Practice Law and Rules, including because, upon information and belief, all Defendants transact and solicit business within the state, have committed the tortious acts described in this complaint within the state, and/or have committed such acts outside of the state causing injury to Plaintiff within the state.

37. This litigation arises from or relates to the tortious activities Defendants visited upon Defendants in the states of New York, Connecticut, New Jersey, California, Florida, and other states.

38. This tortious conduct violated United States Federal Rico Laws.

39. Venue is proper in this district pursuant to 28 U.S.C. § 1391(b) and (c), because a substantial part of the events or omissions giving rise to these claims occurred in this district and because Defendants are subject to personal jurisdiction in this district.

40. Requiring Defendants to litigate these claims in this district does not offend traditional notions of fair play and substantial justice. Plaintiff's claims arise from some conduct occurring by Defendants in New York.

PRAYER FOR RELIEF

Wherefore, Plaintiffs pray for the following relief:

1. For a money judgment representing compensatory damages, including Consequential damages, lost wages, earnings, and all other sums of money, together with interest On those amounts, in an amount to be proven at trial.
2. For an award of money judgment for mental pain and anguish and severe and serious emotional distress, as applicable, in an amount to be proven at trial.
3. For pre- and post-judgment interest.
4. For punitive damages according to proof.
5. For attorney's fees and costs incurred by Plaintiff, as applicable.
6. For such other legal and equitable relief as the court deems appropriate.

DEMAND FOR JURY TRIAL

Plaintiff demands a jury trial on all causes of action so triable.

Dated: February 19, 2025
New York, NY



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